

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<div style="display: flex; justify-content: space-between;"><div>DEUTSCHE BANK TRUST COMPANY</div><div>:</div><div>Civil Action No.:</div></div> <div style="display: flex; justify-content: space-between;"><div>AMERICAS, in its capacity as successor indenture</div><div>:</div><div>1:11-cv-00358-SSB-SKB</div></div> <div style="display: flex; justify-content: space-between;"><div>trustee for certain series of Senior Notes, et al.</div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div></div><div>:</div><div>(Judge Beckwith)</div></div> <div style="display: flex; justify-content: space-between;"><div>Plaintiffs,</div><div>:</div><div>(Magistrate Judge Bowman)</div></div> <div style="display: flex; justify-content: space-between;"><div></div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>v.</div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div></div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>AMERICAN ELECTRIC POWER, et al.,</div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div></div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>Defendants.</div><div>:</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div></div><div>:</div><div></div></div>	
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**MOTION FOR ENTRY OF AGREED EXTENSION OF TIME UP TO AND  
INCLUDING SEPTEMBER 29, 2011 FOR DEFENDANT BERNARD RABINOWITZ,  
INDIVIDUALLY AND AS TRUSTEE U/A/D 09-11-2006 TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFFS' COMPLAINT**

The Plaintiffs and Defendant Bernard Rabinowitz, Individually and as Trustee FBO Bernard Rabinowitz U/A/D 09-11-2006 have agreed to extend the time within which Defendant Bernard Rabinowitz, Individually and as Trustee may answer or otherwise respond to Plaintiffs' complaint until September 29, 2011, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local Rule 7.3(a) and 7.4, Defendant Bernard Rabinowitz, Individually and as Trustee hereby moves the Court to grant the requested extension per the parties' agreement. This motion briefly exceeds the permissible stipulation of Local Rule 6.1(a); and, therefore requires approval of the Court.

Dated: August 10, 2011

Respectfully submitted,

/s/ Daniel J. Donnellon

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*Counsel for Defendant Bernard Rabinowitz,  
Individually and as Trustee U/A/D 09-11-  
2006*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been filed electronically with the U.S. District Court and has been sent electronically this 10<sup>th</sup> day of August, 2011. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. If a party is not given notice electronically through the Court's system a copy will be served by ordinary United States mail, first class postage prepaid, this 10<sup>th</sup> day of August, 2011.

/s/ Daniel J. Donnellon

Daniel J. Donnellon